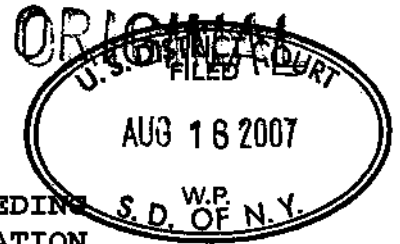


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - -X  
:  
UNITED STATES OF AMERICA :  
:  
- v. - :  
:  
:  
JORGE FLORES, :  
:  
Defendant. :  
- - - - -X

**SUPERSEDEDING  
INFORMATION**

S/ 07 Cr. 387 (CLB)



**COUNT ONE**

The United States Attorney charges:

1. From in or about September 2006 through on or about January 4, 2007, in the Southern District of New York and elsewhere, JORGE FLORES, the defendant, together with others known and unknown, unlawfully, willfully, and knowingly, conspired to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), to wit, the armed robberies of three trucks, and thereby obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3).

(Title 18, United States Code, Section 1951(a).)

**COUNT TWO**

The United States Attorney further charges:

2. From in or about September 2006 through on or about January 4, 2007, in the Southern District of New York and

elsewhere, JORGE FLORES, the defendant, together with others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate the laws of the United States.

3. It was a part and an object of the conspiracy that JORGE FLORES, together with others known and unknown, unlawfully, willfully, and knowingly, would and did seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold for ransom and reward and otherwise persons, and did transport those persons in interstate commerce, in violation of Title 18, United States Code, Section 1201(a)(1).

Overt Acts

4. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about September 13, 2006, JORGE FLORES and co-conspirators not named herein kidnapped two truck drivers in or around Blauvelt, New York.

b. On or about November 14, 2006, JORGE FLORES and co-conspirators not named herein kidnapped the driver of a truck containing cellular phones.

c. In or about November 2006, JORGE FLORES and co-conspirators not named herein kidnapped the driver of a truck containing perfume products.

(Title 18, United States Code, Section 1201(c).)

**COUNT THREE**

The United States Attorney further charges:

5. From in or about September 2006 through in or about January 2007, in the Southern District of New York and elsewhere, JORGE FLORES, the defendant, together with others known and unknown, unlawfully, willfully, and knowingly used and carried firearms, during and in relation to crimes of violence for which he may be prosecuted in a court of the United States, namely, the violations of Title 18, United States Code, Sections 1201 and 1951 as charged in Counts One and Two of this Information, and possessed firearms in furtherance of such crimes, which firearms were brandished.

(Title 18, United States Code, Section 924(c)(1)(A)(ii) and 2.)

**COUNT FOUR**

The United States Attorney further charges:

6. From in or about June 2006 through in or about January 2007, JORGE FLORES, the defendant, together with others known and unknown, unlawfully, willfully, and knowingly combined, conspired, confederated, and agreed together and with each other to violate the laws of the United States.

7. It was a part and an object of said conspiracy that the defendants, and others known and unknown, would and did transport, transmit, and transfer in interstate and foreign commerce goods, wares, merchandise, securities and money, of the

value of \$5,000 and more, knowing the same to have been stolen, converted, or taken by fraud, in violation of 18 U.S.C. § 2314.

OVERT ACTS

a. On or about September 13, 2006, JORGE FLORES, the defendant, together with co-conspirators not named herein, stole a truck from a warehouse in Blauvelt, New York, and transported it to Clifton, New Jersey.

(Title 18, United States Code, Section 371.)

A handwritten signature in black ink that reads "Michael Garcia". The signature is written in a cursive, flowing style. Below the signature is a horizontal line.

MICHAEL J. GARCIA  
United States Attorney